

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

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KPM ANALYTICS NORTH AMERICA  
CORPORATION,

Plaintiff,

v.

BLUE SUN SCIENTIFIC, LLC; THE INNOVATIVE  
TECHNOLOGIES GROUP & CO., LTD; ARNOLD  
EILERT; MICHELLE GAJEWSKI; ROBERT  
GAJEWSKI; RACHAEL GLENISTER; GREGORY  
ISRAELSON; IRVIN LUCAS; and PHILIP  
OSSOWSKI,

Defendants.

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Civil Action No. 4:21-cv-10572-  
TSH

**CONSENT MOTION TO AMEND COURT’S SCHEDULING ORDER**

Defendants Blue Sun Scientific, LLC, The Innovative Technologies Group & Co., LTD, Arnold Eilert, Robert Gajewski, Rachael Glenister, and Irvin Lucas (“Defendants”), hereby file this Consent Motion to Amend the Court’s Scheduling Order in this matter, and state as follows:

1. On or about October 22, 2021, this Court issued its Scheduling Order in this case (Doc. 107) that included the following deadlines:

**Fact discovery** March 1, 2022

**Initial Trial Expert Disclosures** March 31, 2022

**Responsive Trial Expert Disclosures** May 31, 2022

**Trial Expert Depositions** June 24, 2022

**Dispositive Motions** July 8, 2022

**Opposition to Dispositive Motions** August 12, 2022

**Initial Pretrial Conference** September 1, 2022

2. Given the amount of remaining discovery to be conducted in this case, and undersigned counsel's schedule over the next 60 days, Defendants request a modest 30 day extension to the deadlines above. No party will be prejudiced by this request, and Plaintiff consents to the requested modification of the Scheduling Order.

WHEREFORE, Defendants Blue Sun Scientific, LLC, The Innovative Technologies Group & Co., LTD, Arnold Eilert, Michelle Gajewski, Robert Gajewski, Rachael Glenister, Gregory Israelson, Irvin Lucas, and Philip Ossowski ("Defendants"), hereby move this Court to amend its Scheduling Order as reflected in the attached Proposed Amended Scheduling Order.

ARNOLD EILERT, ROBERT GAJEWSKI,  
RACHAEL GLENISTER, and IRVIN  
LUCAS,

/s/ William L. Prickett

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BLUE SUN SCIENTIFIC, LLC, and THE  
INNOVATIVE TECHNOLOGIES GROUP  
& CO., LTD,

/s/ Christopher R. O'Hara

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/s/ George F. Ritchie

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*\* pro hac vice*

Dated: January 19, 2022

**CERTIFICATE OF SERVICE**

I hereby certify that, on January 19, 2022, this document was filed through the CM/ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing. Paper copies will be sent to those indicated as non-registered participants.

/s/ George F. Ritchie

George F. Ritchie